

EXHIBIT 1

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF WYOMING

3 STEPHANIE WADSWORTH, ET AL,

4 Plaintiffs

Case No.

5 vs.

2:23-CV-00118-NDF

6 WALMART, INC., ET AL,

7 Defendants

8 _____/

9 Pursuant to Notice, the videotaped
10 deposition of SAMUEL SUDLER, III was taken on
11 Friday, November 22, 2024, commencing at 10:05
12 a.m., at the offices of Veritext Legal
13 Solutions, 36 S. Charles Street, Suite 2002,
14 Baltimore, Maryland before David C. Corbin, a
15 Registered Professional Reporter and Notary
16 Public.

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21 REPORTED BY: David Corbin, RPR

1 explosion, I think that the entire steel casing is
2 ripped apart. That to me is an explosion. So this
3 vented and pushed out the electrolytic roll. That's
4 how I would describe it.

5 Q. If this hoverboard was attacked by fire as
6 opposed to being the cause of the fire, why were
7 only cells ten and four the ones that vented?

8 A. Based on probably protection. Remember,
9 one of the things you have to understand about this
10 hoverboard is you have an aluminum encasement, you
11 have plastic. The actual battery pack itself has
12 another piece of plastic over top of it. And then
13 you have the plastic for the actual steel cans for
14 the battery cells. And then the cells themselves, I
15 call it the can, but the canister, is made of
16 stainless steel. So you have to be able to
17 penetrate all of those things and then compromise
18 the interior by heating up the steel up enough to
19 create that. In this case ten and four had enough
20 heat to expose them to that and the pressure did not
21 build up in the other battery cells.

1 Q. With the venting of cells four and ten
2 occurring, would you expect that to have led to
3 other cells venting?

4 MR. GIROUX: Form.

5 A. No. No. One of the things they do is an
6 imbalancing related to the standard, I think it's
7 2580 or 2272, and they actually tested where they
8 forced a discharge of one of the cells to see can
9 you create this. They also do the short circuit in
10 the battery pack so that it -- to show it can't
11 extend. But the key thing is do you see evidence of
12 it, and there is no physical evidence of the other
13 cells venting in that scenario.

14 Q. At what temperature would you expect these
15 cells to vent?

16 A. It's not about the temperature, it's about
17 the compromise of the separator. So when the
18 separator is melted and it allows the anode and
19 cathode to come together, that's when it starts to
20 vent. I can't give you a number on it.

21 Q. Okay. Have you looked at any references